



**BlueCross BlueShield  
Association**

An Association of Independent  
Blue Cross and Blue Shield Plans

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August 29, 2019

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Submitted via the Federal Communications Commission's website, <https://www.fcc.gov/ecfs/>

**RE: Promoting Telehealth for Low-Income Consumers (WC Docket # 18-213; FCC 19-64)**

Dear Marlene Dortch:

The Blue Cross Blue Shield Association (BCBSA) appreciates the opportunity to respond to the Federal Communications Commission's (FCC) notice of proposed rule-making (WC Docket # 18-213; FCC 19-64) published in the Federal Register on July 30, 2019 (84 Fed. Reg. 36865).

BCBSA is a national federation of 36 independent, community-based and locally operated Blue Cross and Blue Shield companies (BCBS Plans) that collectively provide healthcare coverage for one in three Americans. For 90 years, BCBS Plans have offered quality healthcare coverage in all markets across America – serving those who purchase coverage on their own as well as those who obtain coverage through an employer, Medicare and Medicaid. BCBS Plans provide coverage for over 7.8 million Medicaid and CHIP enrollees in 24 states and Puerto Rico, including expansion adults, pregnant women, children, individuals with disabilities and the elderly.

BCBSA supports the FCC's efforts to establish the three-year Connected Care Pilot program within the Universal Service Fund (USF) to provide telehealth and telemedicine for medically underserved low-income Americans and veterans. BCBS Plans serve low-income and medically underserved populations with inadequate broadband Internet access (i.e., rural patients and veterans residing in Tribal lands, Medically Underserved Areas and Healthcare Provider Shortage Areas) and believe that a pilot program focusing on improving health outcomes through telehealth could be impactful. It should be noted that states differ in their approach to leveraging telehealth and telemedicine technologies within the Medicaid program. There could be disparities in the spread of pilot projects, especially in states where services delivered through telehealth or telemedicine are not required to be reimbursed at parity for services delivered in office-based settings.

The Connected Care Pilot program could be helpful in complementing telehealth initiatives under the 21<sup>st</sup> Century Cures Act as well as other programs administered by the FCC that are

dedicated to providing connectivity to low-income consumers, like the Lifeline Program. BCBS Plans work with Lifeline wireless providers to provide phones to Medicaid beneficiaries, giving healthcare providers and BCBS Plans a pathway to connect with patients and beneficiaries. These phones are used to deliver vitally important health messages and provide support designed to address many of our nation's key population health goals and health disparities for families with young children to the very frail elderly. Through the Lifeline program, Medicaid beneficiaries are connected to critical health services as well as special programs and supports provided by their health plan.

Thank you for the opportunity to provide comments. We would be pleased to discuss our comments with you at your convenience. If you have questions, please contact Ashley Gray, Director, Medicaid Policy, at 202.626.8612 or [Ashley.Gray@bcbsa.com](mailto:Ashley.Gray@bcbsa.com).

Sincerely,

A handwritten signature in black ink, appearing to read "K. Haltmeyer", with a stylized flourish at the end.

Kris Haltmeyer  
Vice President, Legislative & Regulatory Policy  
Office of Policy & Representation